

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>PERMIT APPLICATION EVALUATION AND CALCULATIONS</b>	PAGES 14	PAGE 1
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	PROCESSED BY LLD	CHECKED BY <i>CDT</i>

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**APPLICATIONS IN THIS BATCH**

A/N 458555: STORAGE TANK C-35  
A/N 481223: STORAGE TANK C-5 (MASTER FILE)  
A/N 482757: STORAGE TANK C-39  
A/N 482758: STORAGE TANK C-40  
A/N 496400: RACK, UNLOADING, ETHANOL AND OFF SPECS  
A/N 500306: TV REVISION (SIGNIFICANT)

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**INTRODUCTION:**

SFPP Colton functions as bulk loading/unloading and pipeline transfer station. It delivers petroleum products via loading racks and pipelines to customers in the southeast California region. The company receives petroleum products from three in-bound pipelines from its Watson station that is part of the pipeline distribution network from Los Angeles refineries.

Because the SFPP terminal functions as a distribution center for petroleum products, it is also responsible for blending of petroleum products to specifications before delivery to customers. To provide this formulation service, SFPP uses inline blending of the petroleum products before the product is loaded into tanker trucks, railcars, or pipeline.

These applications were submitted as follows:

A/N	Previous A/N : P/O	Equipment	Reason for application
458555	444971 : F96720 (Gasoline) (1,095,000 bbl/yr = 91250 bbl/mo)  AV30 = 38 lb/D R2DAY = 38 lb/D R2 = 1.58 lb/hr R1 = 1.58 lb/hr Yrly = 13802.88 lb/yr	Tank C-35 (IFR)	Increase thruput from 91,250 bbl/mo to 4,995,000 bbl/mo  Add secondary seal  Add withdrawal nozzle  (modification)

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481223	434077 : F80418 (Denatured ethanol) 130,010 bbl/mo  AV30 = 1 lb/D R2DAY = 0.72 lb/D R2 = 0.03 lb/hr R1 = 0.03 lb/hr Yrly = 262.08 lb/yr	Tank No. C-5 (Domed EFR)	Increase thruput to 540,000 gal/day = 385,714 bbl/mo  Add inlet nozzle to tank  (modification)
482757	403345 : F59991  AV30 = 1 lb/D R2DAY = 0.72 lb/D R2 = 0.03 lb/hr R1 = 0.03 lb/hr Yrly = 262.08	Tank C-39 (IFR)	Change 0.01 psia limit to "diesel and jet fuel only"  (change of condition)
482758	403344 : F59975  AV30 = 1 lb/D R2DAY = 0.72 lb/D R2 = 0.03 lb/hr R1 = 0.03 lb/hr Yrly = 262.08	Tank C-40 (IFR)	Change 0.01 psia limit to "diesel and jet fuel only"  (change of condition)

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496400	434765 : F80420 (Unload only)  5,460,420 gal/mo  AV30 = 6 lb/D R2Day = 5.52 lb/D R2 = 0.23 lb/hr R1 = 4.4 lb/hr Yrly = 2009.3 lb/yr	Rack Ethanol/Off Specs	Increase lanes from one to two  Replace current pump sleeve with more efficient aboveground unloading system  Increase thruput to 16,200,000 gal/mo  (Modification)
500306	495548 (April 23, 2009 - Rev. 1)	TV Facility Permit	TV Revision (Significant)

There have been no NOV's or NC's within the last three years for this facility.  
There are no schools within 1000 feet of this facility.

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**A/N 458555: Tank No. C-35 – Modification due to thruput increase & addition of secondary seal and withdrawal nozzle**

This application was submitted June 30, 2006 to modify seals and increase thruput, info amended August 2006 to correct TANKS input, and info amended August 2009 to add withdrawal nozzle.

Gasoline is worse case assumed and the tank will be able to store gasoline, transmix, denatured ethanol, diesel, gasoline blending components, jet fuel, alkylates, and oxygenates.

TANKS 4.0.9d printout (dated 10/2/2009 titled "SFPPColtonC35 PreMod) with worse case gasoline RVP = 13.5 psia show the annual emissions total ROG (annual) = 12253.66 lb/yr with maximum emissions occurring in August.

$$\begin{aligned} \text{PreROG (R2)(Aug)} &= 1158.67 \text{ lb/mo} \\ & *1/30 = 38.6 \text{ lb/day (30-day)} \\ & *12*1/365*1/24 = 1.61 \text{ lb/hr} \end{aligned}$$

TANKS 4.0.9d printout (dated 10/2/2009 titled "SFPPColtonC35 PostMod) with worse case gasoline RVP = 13.5 psia show the annual emissions total ROG (annual) = 10769.95 lb/yr with maximum emissions occurring in August.

$$\begin{aligned} \text{PostROG (R2)(Aug)} &= 962.18 \text{ lb/mo} \\ & *1/30 = 32.1 \text{ lb/day (30-day)} \\ & *12*1/365*1/24 = 1.32 \text{ lb/hr} \end{aligned}$$

Pre Mod	Post Mod	Decrease
1.61 lb/hr	1.32 lb/hr	
38.6 lb/day	31.68 lb/day	<b>-6.9 lb/day</b>
38.6 lb/day (AV30)	32.07 lb/day (AV30)	
12253.66 lb/yr (YRLY)	10769.95 lb/yr (YRLY)	

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Toxic Air Contaminants (TACs)

Since there is an emissions decrease, there is no increase in risk.

Rules:

- 402: Nuisance is not expected
- 463: Tank has primary and secondary seals and is expected to comply with this rule.
- 1149: Tank degassing and cleaning operations will comply with this rule.
- 1178: This internal floating roof tank will continue to comply with applicable requirements of this rule.

Reg 13:BACT/LAER: This tank has Cat A primary and secondary seals and is compliant with R463. New fugitive components are less than one pound per day, so leakless valves are not required. Compliance expected.

Modeling: No emissions increase

Offsets: No emissions increase, so no offsets are required.

Facility Compliance: There have been no NOV's or NC's during the last three years

1401: Since there is no emission increase due to this modification, there will no increase in risk.

40CFR60 Kb: This tank is subject to Kb and is expected to comply with applicable requirements.

Title V: This permit will be issued as a revision (Deminimus Significant) to the existing Title V Permit (under A/N 500306) after a 45-day EPA review period.

RECOMMENDATION:

A Permit to Construct/Operate is recommended with the attached conditions.

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**A/N 481223: Tank No. C-5 – Modification due to thruput increase and addition of inlet nozzle**

This was submitted to increase thruput and to add a nozzle to an existing domed, external floating roof tank that currently stores denatured ethanol. Current thruput of 131,010 bbl/mo will be increased to 385,714 bbl/mo to meet the increase 10% ethanol blending mandate by January 2010. Nozzle will be used to bring denatured ethanol to loading rack no. 7. Fugitive components associated with this nozzle were already accounted for in rack no. 7 of A/N 474546. Thus, there are no emissions associated with this new nozzle on this permit unit.

TANKS 4.0.9d printout (dated 7/30/09 titled "SFPPColtonTankC-5PostMod) with denatured ethanol (TANKS default VPs) show the annual emissions total ROG (annual) = 757.52 lb/yr with maximum emissions occurring in August.

$$\begin{aligned} \text{ROG (R2)(Aug)} &= 63.8 \text{ lb/mo} \\ *1/30 &= 2.13 \text{ lb/day (30-day)} \\ *1/24 &= 0.089 \text{ lb/hr} \end{aligned}$$

Pre Mod	Post Mod	Increase
0.03 lb/hr	0.09 lb/hr	0.06 lb/hr
1.00 lb/day	2.13 lb/day (30 day)	1.13 lb/day

ERC needed:  $1.13 * 1.2 = 1.36 \text{ lb/day}$   
**1 pounds ERC**

**Toxic Air Contaminants (TACs)**

VOC emissions emitting from petroleum product storage tanks normally include certain amounts of TACs depending on the products stored. Based on submitted data (SFPP/SABS pg 8 for ethanol unloading rack in A/N 496400), the worst case scenario is ethanol denatured with 5% gasoline. Using USEPA TANKS model run with 95% ethanol/5% gasoline, results show that 21% of the vapor is from the gasoline portion. Thus, assuming maximum toxic weight fractions, the table below shows the TAC mass emissions for the external floating roof tank.

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TAC emissions lb/yr = wt.% \* (757.52 lb/yr of VOC)\* 21% gasoline vapor content

TAC Emissions from Storage Tank

TAC	Wt.% in Gasoline Vapor	Emissions, lbs/yr	Emissions, lb/hr
Benzene	0.9	1.43	0.00016
Ethyl benzene	0.10	0.159	0.00002
n-Hexane	1.6	2.55	0.00029
Toluene	1.3	2.07	0.00024
Xylenes	0.5	0.795	0.00009
Naphthalene	0.05	0.08	0.00001

In accordance with the procedures prescribed in the District's Risk Assessment Procedures for Rules 1401 and 212, a Tier 3 Screening Modeling or the SCREEN3 analysis was performed (see Excel Spreadsheet Tier 3 Screening Risk Assessment).

Assume:      Volume Source  
                   Urban Option  
                   Residential/school = 366 m = 1200 ft (From SFPP Map)  
                   Commercial = 71 m = 250 ft (from SFPP Map)  
                   Tank Dimensions:    H = 48 ft. = 14.6 m.(height of tank)  
   Diam. = 61 ft = 18.6 m.  
   Area base = 2921 sq. ft.  
                   Surface area side =  $2 * 3.14 * \text{radius} * H$   
   = 852.7 sq.m.

$$y_0 = (\text{SA side}/2)^{0.5}/(4.3)$$

$$= (852.7/2)^{0.5}/(4.3) = 4.8 \text{ m.}$$

$$z_0 = \text{vertical dimension of source}/2.15$$

$$= (14.6/2.15) = 6.79 \text{ m.}$$

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The results indicate that the MICR for the residential receptor is 1.07E-08 and for the worker is 8.87E-08. Thus, the MICR is less one in one million and each chronic and acute index is also well below the threshold limit of 1.0.

Note that this is the post mod "total" risk, which is more conservative than the "increased" risk due to the increased thrupt.

Rules:

- 402: Nuisance is not expected
- 463: Tank has primary and secondary seals and is expected to comply with this rule.
- 1149: Tank degassing and cleaning operations will comply with this rule.
- 1178: This domed, external floating roof tank will continue to comply with applicable requirements of this rule.
- Reg 13: There is an emission increase of 1.13 lb/day of ROG.  
BACT/LAER: This tank has Cat A primary and secondary seals and is compliant with R463. Compliance expected.  
Modeling: Not required for ROG.  
Offsets: 1 lb of ERC is required.  
Facility Compliance: There have been no NOV's or NC's during the last three years  
Major Polluting Facility  
Statewide Compliance – SFPP has certified statewide compliance per January 12, 2009 letter (attached)
- 1401: A Tier 3 HRA shows that the risk from the operation of this tank is less than one in a million and HIA and HIC are less than one.
- 40CFR60 Kb: Previous evaluation (A/N 434007) show tank was installed in 1955, geodesic dome installed in 1989 (no increase), commodity change from gasoline to ethanol in 2003 (no increase), thrupt increase in 2006 (less than one lb/day increase). This modification (increase in thrupt plus addition of nozzle) will result in an increase of emissions (1.13 lb/day). However, since this modification is a thrupt increase without a corresponding capital expenditure, Kb is NOT triggered.
- Title V: This permit will be issued as a de minimus significant revision to the existing Title V Permit (under A/N 500379) after a 45-day EPA review period.

**RECOMMENDATION:**

A Permit to Construct/Operate is recommended with the attached conditions.

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**A/N 482757 & 482758: Tanks No. C-39 & C-40 – Change of Condition from VP limit to commodity limit**

These "identical" storage tanks were submitted 5-16-08 to replace the current permit limit of 0.01 psia with a commodity of "diesel and jet fuel" in previous permits A/N 403345 and 403344. Since the vapor pressure of diesel and jet fuel are both 0.01 psia, there is no increase in VOC emissions.

The previous application showed HRA was performed assuming diesel only. Per email from Yijin Wang dated 09-14-09 with jet fuel vapor speciation (attached), there are no TACs in jet fuel. Thus, there is no additional health risk with jet fuel.

Since there is no change in emissions, the ROG values in the previous NSR will be entered.

**Rules:**

- 402: Nuisance is not expected
- 463: Tanks have primary and secondary seals and are expected to comply with this rule.
- 1149: Tank degassing and cleaning operations will comply with this rule.
- 1178: Not applicable since the vapor pressure of diesel and jet fuel at 0.01 psia, less than the 0.1 psia applicability.
- Reg 13: There is NO increase in emissions, so Reg 13 is not triggered.
- 1401: A Tier 2 HRA was done in the previous application and shows that the risk from the operation of the tanks are less than one in a million and HIA and HIAC are less than one.

40CFR60 Kb: Not applicable due to the low vapor pressure.

**Title V:** This permit will be issued as a revision (Deminimus Significant) to the existing Title V Permit (under A/N 500306) after a 45-day EPA review period.

**RECOMMENDATION:**

A Permit to Operate is recommended with the attached conditions.

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### **A/N 496400: Unloading Rack No. 1**

This application was submitted 3/13/09 to modify an existing permit (A/N 434765:P/O F80420) to increase lanes from one to two, replace current pump sleeve with more efficient aboveground unloading system, and increase ethanol unloading thruput from 5,460,420 gal/mo to 16,200,000 gal/mo. An existing off specification gasoline unloading thruput of 70,000 gal/mo will be retained and equipment associated with it will not change.

Emissions from the modification come from fugitive components and from vapors emitted during the initial fill events.

During a fill event, VOC emissions are generated during the evacuation of vapors from the product accumulator and air eliminator. Denatured ethanol arrives via tanker truck and is unloaded through one of the skid mounted systems. Each tanker truck is assumed to have a capacity of 8400 gallons and up to five compartments. Generally, two compartments are emptied simultaneously (which equals 2.5 "events"), but emissions will be conservatively based on four "events". Emissions generated during an "event" corresponds to the evacuation of the volume of the vapors in the product accumulator and the air eliminator.

The product accumulator is a horizontal piece of equipment approximately 9 feet long with a diameter of 2.5 feet with ellipsoidal heads. This results in a total vapor space volume of 148 gallons assuming a six inch product level. A 6-8 inch product level is necessary to assure the pump is protected as unloading is initiated.

The air eliminator has a capacity of 120 gallons with an effective volume of 67 gallons. Since the vapor space vacated includes the volume above the top of the effective volume, 90% of the 120 gallons, or 108 gallons, was used to be conservative.

The total volume vacated per event is 148 + 108 or 256 gallons. At a monthly throughput of 16,200,000 gallons, there are 1929 tanker truck deliveries per month. At 4 events per tanker, there are 7714 events per month. The total "volume of vapors" evacuated (or "displaced") is 7714 events \* 256 gal = 1,974,857 gal/mo.

Assume that the vapors displaced (1,974,857 gal/mo) during unloading is equivalent to 1,974,857 gal/mo of ethanol loaded. The emissions resulting from this vapor displacement can be determined using a "loading" equation.

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Bulk Loading Losses: VOC emissions from loading petroleum products into tank trucks can be calculated by using the equation in EPA AP-42, 5.2:

$$L = 12.46 \text{ SPM/T}$$

Where: L = VOC emissions in lbs/1000 gal loaded  
M2 = Molecular wt. of vapor, 46 lb/lb-mole (ethanol, default value in TANKS)  
P2 = True VP, 0.99 psia (from TANKS default)  
T = 528 deg R (68 F + 460)(from SABs March 2009 submittal pg 5)  
S = Saturation factor, 1.0 (submerged fill, ded. vapor balance, Table 5.2-1,AP-42)

For uncontrolled, L (VP=0.99 psia) = 1.07 lb/1000 gal loaded

$$\begin{aligned} R1(\text{ROG}) &= 1.07 \text{ lb/1000 gal} * 1,974,857 \text{ gal/mo} * 1/30 \\ &= 70.4 \text{ lb/day, 30-day} \\ &= 25357.2 \text{ lb/yr} \\ &= 12.7 \text{ tpy} \\ &= 2.89 \text{ lb/hr} \end{aligned}$$

Assume 95% vapor balance efficiency

$$\begin{aligned} L(R2) &= (1.07 \text{ lb/1000 gal loaded})(1-0.95) \\ &= 0.0535 \text{ lbs/1000gals loaded} \end{aligned}$$

$$\begin{aligned} R2(\text{ROG}) &= 0.0535 \text{ lb/1000 gal} * 1,974,857 \text{ gal/mo} * 1/30 \\ &= 3.52 \text{ lb/day, 30-day} \\ &= 1267.9 \text{ lb/yr} \\ &= 0.63 \text{ tpy} \\ &= 0.14 \text{ lb/hr} \\ &= 3.47 \text{ lb/day} \end{aligned}$$

*PreMod Emissions:*

*A/N 434765 used TANKS 4.0 to determine ethanol unloading emissions to R1=11.98 lb/day and R2 = 0.6 lb/day (assuming 95% control). Using the equivalent "loading" methodology actually gives a more conservative(higher) result mainly due to the higher "events" in loading methodology compared to the "turnovers" in TANKS..*

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Fugitives:

Based on Spreadsheet submitted with application SABS March 2009 submittal pg 6 Table 1), the fugitive emissions are 0.79 lb/day (at 500 ppm). A permit condition will be added to limit the new components to 500 ppm.

Emissions Summary:

POST MOD	R1 (ROG)		R2 (ROG)	
	Lb/hr	Lb/day	Lb/hr	Lb/day
Ethanol	2.89	69.36	0.14	3.47
Off Specs Gas*	0.41	9.8	0.02	0.49
Fugitives	0.03	0.79	0.03	0.79
<b>Post Mod Total</b>	<b>3.33</b>	<b>79.95</b>	<b>0.19</b>	<b>4.75</b>
30-day avg				4.82

\* see calculations dated 8-12-09 pg 2 of 2 (NSR update to A/N 434765)

PREMOD Emissions:        ROG = 5.52 lb/day  
                                       ROG = 6.00 lb/day (30-day)

Decrease in emissions:    -1.18 lb/day  
*(Replacing the old pump sleeves with the newer skid mounted system results in less emissions, even after the thruput increase)*

EVALUATION:

Rules:

- 401: No visible emissions are expected.
- 402: No nuisance is expected with proper operational procedures and mitigation measures.
- 462: This rule is not applicable since the rule applies to "loading" and this equipment is UNLOADING operations.
- 1173: This facility is expected to comply with the requirements of this rule. New fugitive components will be limited to 500 ppm.
- Reg 13: This rule is not triggered since there is an emission decrease of 1 lb/day of ROG during loading operations. System already uses a vapor balance for VOC control.
- 1401: Since there is an emission decrease, there is also a risk decrease. This rule is not triggered.

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40 CFR 60 Subpart XX: This subpart is applicable to gasoline loading but this equipment is gasoline (off specs) UNLOADING. Not applicable.

Title V: This permit will be issued as a revision (Deminimus Significant) to the existing Title V Permit (under A/N 500306) after a 45-day EPA review period.

This project will meet all District Rules and Regulations. It is recommended that a Permit to Construct be granted subject to the attached conditions.